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BY ECF

Hon. Sanket J. Bulsara  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Cruz v. Santana*, No. 20-CV-891 (EK) (SJB)

Dear Judge Bulsara:

We represent Defendant Henry Santana in the above-referenced *Bivens* action. In accordance with the Court's September 22, 2020 Scheduling Order, on behalf of both sides we respectfully enclose as Exhibit A hereto the parties' Discovery Plan Worksheet.

By separate letter-motion being filed concurrently with this submission, Defendant is requesting, with Plaintiff's consent, a stay of the deadlines set forth in the Worksheet for Phase II that are subsequent to the proposed March 24, 2020 deadline for serving initial document requests and interrogatories, pending Plaintiff's intended filing of a further amended complaint. The background to and reasons for the stay request are set forth in Defendant's letter-motion.

Thank you for your consideration of this matter.

Respectfully,



Elizabeth Wolstein

Cc: Baree Fett, Esq. (via ECF)  
Gabriel P. Harvis, Esq. (via ECF)